

CITY OF LAKE STEVENS

2015 Stormwater Management Program

INTRODUCTION

The City of Lake Stevens (City) 2015 Stormwater Management Program (SWMP) has been prepared as a summary of actions and activities that the City is planning for the year 2015 to satisfy the requirements of the Western Washington Phase II Municipal Stormwater Permit (Phase II Permit), Special Condition S5. This also fulfills the requirement of the Phase II Permit to update the SWMP annually.

The Phase II Permit, which has been in effect since 16 February 2007, is a component of the National Pollutant Discharge Elimination System (NPDES) permit program that was authorized by the Federal Water Pollution Control Act (aka the Clean Water Act). The 2007 Phase II Permit expired on 15 February 2012 and was extended by the State until 1 August 2013 which is the effective date of the 2013-2018 permit. This SWMP was prepared in accordance with the 2013-2018 permit

Compliance with the Phase II Permit requirements provides assurance that the stormwater discharge from the City storm system will not have a negative impact on water quality/quantity and public safety. The implementation of this program identifies actions that will provide protection and preservation of the City lakes, streams and other environmentally sensitive areas for the public benefit consistent with the critical area protection goals of the City Comprehensive Plan.

Washington State Department of Ecology (Ecology) has been delegated the authority to enforce and monitor the Phase II Permit by the Environmental Protection Agency (EPA). Annual reports are submitted by the City to Ecology as required by the Phase II Permit which includes the SWMP. The SWMP must include the following components:

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination
- Runoff Controls for New Development, Redevelopment and Construction Sites

- Pollution Prevention and Operation and Maintenance for Municipal Operations
- Monitoring

Additional information regarding the NPDES permit program can be found on the following websites:

- Ecology: <http://www.ecy.wa.gov/programs/wq/stormwater/municipal/index.html>
- EPA: <http://cfpub1.epa.gov/npdes/index.cfm>.

In 2010, the City annexed approximately 2,400 acres in the southwest area of Lake Stevens. This increased the area of the City by approximately 70% and the population by 10,500. As part of the annexation the City entered into an interlocal agency agreement with Snohomish County (County) that included stormwater maintenance. The County agreed to maintain the stormwater system until December 31, 2010.

In 2011, the City accepted the responsibility for maintenance of the stormwater system in the southwest annexation area. Although the City's stormwater service area nearly doubled, due to an economic downturn no additional staff was hired and one position was eliminated.

In December of 2012 Yoshihiro Monzaki, who had been managing the NPDES permit left the City. Feb 2012 Mathew Goad filled the vacancy left by Yoshihiro Monzakis departure and has assumed responsibilities of managing the City's NPDES permit.

1) PUBLIC EDUCATION AND OUTREACH

Special Condition S5.C.1 of the Phase II Permit requires that a public education and outreach program be developed to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts and encourage the public to participate in stewardship. In order to fulfill this requirement:

- a. The City will provide an education and outreach program for the area served by the MS4. To achieve this the City has partnered with the Snohomish Conservation District (SCD) to develop and implement a city-wide education and outreach program addressing potential pollutants and nutrient loading (with emphasis on phosphorous) from homes and yards.

- i. **To build general awareness** targeted at school age children and the general public.
 - A high school water quality class curriculum specific to Lake Stevens phosphorous control/prevention has been developed and will continue to be implemented into the class room in 2015. And engage “green team” of student leaders for job shadowing and mentoring opportunities.
 - “I love Lake” program presence at Aquafest 2015 Goal 2000 people touched and 200 pledges to make positive changes to one property or behaviors.
 - ii. **To affect behavior change** targeted at residents, landscapers and property managers/owners.
 - The city in partnership with the Snohomish Conservation District will continue to market the “I love Lake” certifications of private properties. Objectives: to have 7 residential or businesses landscapes retrofitted and recognized by 2016.
 - The City has partnered with ECOSSE to provide a program within the city to increase the awareness and understanding of stormwater management among business owners, managers, and employees, and encourage businesses to practice pollution prevention and best management practices. 25 businesses received educational training in 2014 and it is planned that another 25 businesses will received educational training in 2015
 - iii. **Continuing activities**
 - Continue to provide biodegradable bags at the pet waste stations and educational information at those stations.
 - Regular updates to City website stormwater information.
 - Provide water quality and environmental educational information at the City's 2013 AquaFest and other key events.
 - The City is in the process of updating an educational sign at the City Maintenance Facility rain garden and hopes to have it install in the early part of 2015.
- b. The City will continue to create stewardship opportunities and partner with existing organizations to encourage residents to participate in water quality improvement activities . As part of this the city will be working in collaboration with Sound Salmon Solutions in organizing and promoting storm drain marking volunteer events within the city. The city will continue to work with the Snohomish Conservation District to further develop the “I love lake” program with the aim of reducing phosphorus run off from private properties,

- c. As part of the education and outreach programs the City and SCD has conducted in 2013/2014 a survey was conducted after the workshops and events to evaluate the level of behavior change and provide behavior change analyses. The city and SCD will use this information to direct future workshops and outreach programs most effectively.

2) PUBLIC INVOLVEMENT AND PARTICIPATION

Special Condition S5.C.2 of the Phase II Permit requires ongoing opportunities for public involvement and participation through advisory councils, public hearings, watershed committees, participation in developing rate-structures or other similar activities. In order to fulfill this requirement:

- a. The City will seek opportunities for the public to participate in the decision-making processes involving the development, implementation, and update of the City's SWMP. The City will place a notice in the local news paper (Lake Stevens Journal) that the SWMP has been posted on the City's web site and is looking for public input/comments concerning the plan. Any feedback from the public will be considered in the update of future SWMPs.
- b. The City will post on its website its current SWMP and NPDES annual report no later than May 31st of each year.

3) ILLICIT DISCHARGE DETECTION AND ELIMINATION

Special Condition S5.C.3 of the Phase II Permit requires an ongoing program designed to prevent, detect, characterize, trace and eliminate illicit connections and illicit discharges into the City's small municipal separate storm sewer systems (MS4). In order to fulfill this requirement:

- a. The City will continue to update and refine its mapping of the MS4. The map has been developed using a Geographical Information System (GIS) software. The City's GIS data, at a minimum, includes or will include the following information:
 - i. Identified MS4 outfalls. Currently at this time there are 342 outfalls mapped. It is believed that additional outfalls may exist and efforts are being made to identify and map them.
 - ii. All receiving waters, other than ground water have been mapped and identified. This includes lakes and streams.

- iii. Stormwater treatment and flow control BMPs/facilities owned or operated by the City. There are 63 identified City-owned facilities mapped.
 - iv. The City has mapped the major majority of tributary conveyances within its limits with the following attributes:
 - Conveyance type, material, and size, where known.The following information will be mapped as individual data sets
 - Associated drainage areas.
 - Land use.
 - v. The City will continue to map connections to the MS4 that were authorized or allowed after February 16, 2007.
 - vi. Geographic areas served by the City's MS4 that do not discharge stormwater to surface waters. At this time there are no known areas within the City where the MS4 does not discharge stormwater to surface waters.
 - vii. To the extent consistent with national security laws and directives, the City shall make available to Ecology upon request, MS4 map(s) depicting the information required in S5.C.3.a.i through vi above. The preferred format for mapping will be an electronic format with fully described mapping standards.
 - viii. The City's GIS data is available upon request to other government entities and federally-recognized Indian Tribes.
- b. The Lake Stevens City Council adopted Ordinance 808 in 2009 which included Lake Stevens Municipal Code (LSMC) Section 11.06. Stormwater Management. This section of the LSMC prohibits non-stormwater, illegal discharges, and/or dumping into the City's municipal separate storm sewer system to the maximum extent allowable under the State and Federal law.
- i. The LSMC Section 11.06 lists non-polluting, non-stormwater allowable discharges
 - ii. The LSMC Section 11.06 lists non-polluting, non-stormwater conditionally allowable discharges
 - iii. The City will further address, in updates to the LSMC, known categories of allowable discharges and conditionally allowable discharges if identified as significant sources of pollutants to Waters of the State.
 - iv. LSMC Chapter 17.20 provides the regulatory mechanism for enforcement procedures and actions that have an escalating scale of enforcement as follows:
 - Voluntary Correction.
 - Suspension or Revocation of Permits.
 - Notice and Order to include possible monetary penalty.
 - Abatement.
 - v. The City regulatory policy is a policy of voluntary correction first. The City's first step in regulatory compliance is to assist the violator with voluntary

- correction by providing education and technical assistance. The education and technical assistance includes referencing the currently adopted version of the Stormwater Management Manual for Western Washington for Source control BMPs for pollutant generating sources and maintenance standards for stormwater facilities.
- vi. If it is found that the City's Municipal Code fails to meet the requirements of the section of the permit it will be revised no later than February 2, 2018
- c. The City has implemented an ongoing program designed to detect and identify non-stormwater discharges and illicit connections into the city's MS4. The program includes the following components:
- i. Procedures for conducting investigations of the City's MS4. The City has developed a field screening methodology and procedures based on Snohomish County's 2012 Dry Weather Outfall Screening Manual. The manual has been modified to fit the phase 2 permit and the characteristics of the City's MS4.
The City will complete field screening for at least 40% of the MS4 no later than December 31, 2017, and on average 12% each year thereafter.
 - ii. City website includes a telephone number (425-212-3313 during office hours and 911 after hours) for public reporting of spills and illicit discharges. Calls received and follow-up actions are documented and filed.
 - iii. Illicit discharge detection and elimination (IDDE) training for the City's field staff was provided in October 2009 and December 2010. In the next permit cycle, the City will review staff trainings and use a modified version of "Snohomish County field personnel training presentation" to train remaining municipal field staff, who, as part of their normal job responsibilities, might come into contact with or otherwise observe an illicit discharge and/or illicit connection to the MS4, on the identification of an illicit discharge and/or connection, and on the proper procedures for reporting and responding to the illicit discharge and/or connection. The City will document and maintain records of the trainings provided and the staff trained in the City's "Compliance Training" spread sheet.
 - iv. To inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste. The City has partnered with ECOSSE to provide a program within the city to increase the awareness and understanding of stormwater management among business owners, managers, and employees, and encourage businesses to practice pollution prevention and best management practices.
- d. The City will implement an ongoing program designed to address illicit discharges, including spills and illicit connections, into the City's MS4. The City

will incorporate into its own IDDE program procedures from Snohomish County's 2012 Dry Weather Outfall Screening Manual for:

- i. Characterizing the nature of, and potential public or environmental threat posed by illicit discharges.
- ii. Trace the source of an illicit discharge.
- iii. A procedure for eliminating the discharge to the City's MS4. This procedure will include steps on the notification of appropriate authorities and property owners. Providing technical assistance, follow-up inspections and the use of the compliance strategy developed pursuant to S5.C.3.b.v.
- iv. To be compliant with the provisions in (i), (ii), and (iii), above, the City will meet the following timelines:
 - Immediately respond to illicit discharges, including spills, which are determined to constitute a threat to human health, welfare, or the environment, consistent with General Condition G3.
 - Investigate (or refer to the appropriate agency with the authority to act) within 7 days, on average, any complaints, reports or monitoring information that indicates a potential illicit discharge.
 - Initiate an investigation within 21 days of any report or discovery of a suspected illicit connection to determine the source of the connection, the nature and volume of discharge through the connection, and the party responsible for the connection.
 - Upon confirmation of an illicit connection, use the compliance strategy in a documented effort to eliminate the illicit connection within 6 months. All known illicit connections to the MS4 will be eliminated.
- e. The City has and will continue to train staff that are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges by utilizing the Snohomish County IDDE Staff Training presentation. The training provided and the staff trained will be documented and recorded in the City's "Compliance Training" spread sheet.
- f. The City will track and maintain records of the activities conducted, tasks completed, reports and complaints received, under the IDDE program, utilizing standard forms, Spreadsheets and GIS data bases.

iv. Controlling Runoff from New Development, Redevelopment and Construction Sites

Special Condition S5.C.4 of the Phase II Permit requires that the City will implement and enforce a program to reduce pollutants in stormwater runoff to the City's MS4

from new development, redevelopment and construction site activities. The program will apply to private and public development, including roads. In order to fulfill this requirement:

- a. The City will implement or have in place an ordinance or other enforceable mechanism that addresses runoff from new development, redevelopment, and construction site projects. The ordinance or other enforceable mechanism to implement this requirement will be adopted and effective no later than December 31, 2016.
 - i. To meet the Minimum Requirements, thresholds, and definitions in Appendix 1 of the 2013-2018 NPDES Phase II Municipal Stormwater Permit, the City will adopt the 2012 Stormwater Management Manual for Western Washington in its entirety. This covers everything in Appendix 1 except section 7 Basin/Watershed Planning, the city does not intend to do any basin watershed Planning at this time.
 - ii. The City will adopt the 2012 Stormwater Management Manual for Western Washington in its entirety. in order to meet the following requirements, limitations, and criteria that, when used to implement the minimum requirements will protect water quality, reduce the discharge of pollutants to the Maximum Extent Practicable (MEP), and satisfy the State requirement under chapter 90.48 RCW to apply AKART prior to discharge:
 - a) Site planning requirements
 - b) BMP selection criteria
 - c) BMP design criteria
 - d) BMP infeasibility criteria
 - e) LID competing needs criteria
 - f) BMP limitations
 - iii. The LSMC chapter 11.06 Stormwater Management in combination with chapter 17 Enforcement grant the City the legal authority, through the approval process for new development and redevelopment, to inspect and enforce maintenance standards for private stormwater facilities approved under the provisions of this section that discharge to the Permittee's MS4.
- b. The City is in the process of updating its permitting process for site plan review, inspection and enforcement capability, for both private and public projects, using qualified personnel (as defined in Definitions and Acronyms). At a minimum, this program will be applied to sites that meet the minimum thresholds adopted pursuant to S5.C.4.a above. In order to meet these requirements, the City has in place the following:
 - i. LSMC Section 11.06.030 requires stormwater management review and approval of developments any development or proposed project that

- meets or exceeds the threshold conditions defined in the Stormwater Manual (e.g., new impervious area, drainage system modifications, redevelopments, etc.) and is subject to a City development permit or approval requirement.
- ii. LSMC chapter 11.06.100 requires the City as part of its permit review process to inspect prior to clearing and construction, permitted development sites that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 Determining Construction Site Sediment Damage Potential
 - iii. The City inspects permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls. The City also enforces as necessary based on the inspection. Contractors are notified of any defects and are required to perform the necessary corrections within a timely manner.
 - iv. Permitted development sites upon completion of construction and prior to final approval or occupancy are inspected by the City to ensure proper installation and function of permanent stormwater facilities. The City also verifies that a maintenance plan is completed and the responsibility for maintenance is assigned for stormwater treatment and flow control BMPs/facilities. This is enforced as necessary based on inspections.
 - v. The City uses a permit management software to track and manage permits. This software is customizable and will be modified to track inspections and violations.
 - vi. LSMC Chapter 17.20 provides the regulatory mechanism for enforcement procedures and actions
- c. The City's program will include provisions to verify adequate long-term operation and maintenance (O&M) of stormwater treatment and flow control BMPs/facilities that are permitted and constructed pursuant to (b) above. These provisions will be in place no later than December 31, 2016
- i. Currently LSMC Chapter 11.06.
 - a) Identifies the party responsible for maintenance
 - b) Authorizes the City to enter and inspect private drainage facilities
 - c) Provides enforcement through the City's LSMC Chapter 17.
 - ii. By adopting the 2012 SWMMWW the City will update its maintenance Standards
 - iii. The City will perform annual inspections of identified stormwater treatment and flow control BMPs/facilities that discharge to the MS4 and were designed and constructed to the minimum requirements of the 2005 SWMMWW. At this time it is known that there is only one BMPs/facilities within the City was constructed to these requirements.
 - iv. As part of the City's permitting process the City will perform inspections of identified permanent stormwater treatment and flow control BMPs/facilities

- and catch basins in new residential developments every six months until 90% of the lots are constructed (or when construction is stopped and the site is fully stabilized) to identify maintenance needs and enforce compliance with maintenance standards as needed.
- v. The City will develop and implement an inspection program to inspect sites and maintain records of inspections.
 - vi. Unless there are circumstances beyond the City's control, when an inspection identifies an exceedance of the maintenance standard, maintenance will be performed:
 - a) Within 1 year for typical maintenance of facilities, except catch basins.
 - b) Within 6 months for catch basins.
 - c) Within 2 years for maintenance that requires capital construction of less than \$25,000.
 - vii. By customizing the City's permit management software to track inspections and violations, the City will have a record of inspections and enforcement actions by staff, including inspection reports, warning letters, notices of violations, and other enforcement records. Records of maintenance inspections and maintenance activities will be kept in a combination spreadsheet in a GIS database.
- d. The City will make available, as applicable, copies of the "Notice of Intent for Construction Activity" and copies of the "Notice of Intent for Industrial Activity" to representatives of proposed new development and redevelopment. The City will continue to enforce local ordinances controlling runoff from sites that are covered by stormwater permits issued by Ecology.
- e. The City will continue to ensure that staff, whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Follow-up training will be provided as needed to address changes in procedures, techniques or staffing. Regular meetings are held to determine any gaps in trainings and to review procedures. The training provided and the staff trained will be documented and recorded in the City's "Compliance Training" spreadsheet.
- i. To fulfill part of this requirement the City will provide for site inspectors Certified Erosion and Sediment Control Lead (CESCL) Certification. This will enable them to better identify and enforce erosion and sediment violations and implement BMPs as applicable.
- f. The City will implement low impact development code-related requirements.

- i. In 2008 the City was part of the Low Impact Development Local Regulation Assistance Project run by the Puget Sound Partnership. As a result the City codes were reviewed and suggested updates were drafted to incorporate LID principles into the City's development codes. Over the next few years the City will review these suggestions, revise them as necessary and update its codes adoringly by December 31, 2016.
- ii. The City will submit a summary of the results of the review and revision process in (i) above with the annual report due no later than March 31, 2017. This summary will include, at a minimum, a list of the participants (job title, brief job description, and department represented), the codes, rules, standards, and other enforceable documents reviewed, and the revisions made to those documents which incorporate and require LID principles and LID BMPs. The summary will include existing requirements for LID principles and LID BMPs in development related codes. The summary will be organized as follows:
 - Measures to minimize impervious surfaces;
 - Measures to minimize loss of native vegetation; and
 - Other measures to minimize stormwater runoff.

V. MUNICIPAL OPERATIONS AND MAINTENANCE

Special Condition S5.C.5 of the Phase II Permit requires the City to implement an operations and maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. In order to fulfill this requirement:

- a. The City will update its maintenance standards for drainage facilities by adopting the 2012 Ecology Stormwater Management Manual for Western Washington by December 31, 2016
 - i. The purpose of the maintenance standard is to determine if maintenance is required. The maintenance standard is not a measure of the facility's required condition at all times between inspections. Exceeding the maintenance standard between inspections and/or maintenance is not a permit violation.
 - ii. Unless there are circumstances beyond the City's control, when an inspection identifies an exceedance of the maintenance standard, maintenance will be performed:
 - Within 1 year for typical maintenance of facilities, except catch basins.
 - Within 6 months for catch basins.

- Within 2 years for maintenance that requires capital construction of less than \$25,000.

Circumstances beyond the City's control include denial or delay of access by property owners, denial or delay of necessary permit approvals, and unexpected reallocations of maintenance staff to perform emergency work. For each exceedance of the required timeframe, the City will document the circumstances and how they were beyond their control.

- b. The City has and will continue perform an annual inspection of municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities, and take appropriate maintenance actions in accordance with the adopted maintenance standards. At this time there are 63 known facilities that are owned or operated by the City. Facilities have been mapped in one GIS Data set and each facility has a customized inspection check list based on the features in that facility. An inspection process and schedule has been developed and inspections are being tracked in the cities Facility Tracking spread sheet.
- c. The City is in the process of creating a list of facilities that have the potential of being damaged or over whelmed from a major storm event. After an major storm event (24 hour storm event with a 10 year or greater recurrence interval which for the Lake Stevens area is 2.5 inches of rain fall in a 24 hour period) the city will perform spot checks of these potentially damaged permanent stormwater treatment and flow control BMPs/facilities. If spot checks indicate widespread damage/maintenance needs, the City will inspect stormwater treatment and flow control BMPs/facilities that may be affected. Then, the City will conduct repairs or take appropriate maintenance action in accordance with maintenance standards established above, based on the results of the inspections.
- d. The City is in the process of performing inspections of the 4117 catch basins and inlets that are owned or operated by the City at least once no later than August 1, 2017 and every two years thereafter. The City will clean catch basins if the inspection indicates cleaning is needed to comply with the maintenance standards established in the currently adopted Stormwater Management Manual for Western Washington. Decant water will be disposed of in accordance with Appendix 6 Street Waste Disposal.
- e. The City has developed and implemented an inspection programs for both treatment and flow control BMPs/facilities and Catch Basins. These programs determine the scheduling of inspections, the inspection processes (What to look for/ measure), and evaluate the need for maintenance by incorporating the maintenance standards, check lists, scheduling maintenance and follow up checks

- f. The City will develop Standard Operating Procedures (SOPs) for the various tasks that the maintenance crews partake in, including but not limited to,
- Pipe cleaning
 - Cleaning of culverts that convey stormwater in ditch systems
 - Ditch maintenance
 - Street cleaning
 - Road repair and resurfacing, including pavement grinding
 - Snow and ice control
 - Utility installation
 - Pavement striping maintenance
 - Maintaining roadside areas, including vegetation management
 - Dust control

These SOPs will implement practices, policies and procedures to reduce stormwater impacts associated with runoff from lands owned or maintained by the City, and road maintenance activities under the functional control of the City.

- g. The City will implement a training program for its employees whose primary construction, operations or maintenance job functions may impact stormwater quality. These trainings will include a combination of certification training such as CESCL, HAZWOPER and trainings as part of the monthly crew meetings addressing such topics as inspections, selection and installation of erosion control BMPs, spill response, etc. The training provided and the staff trained will be documented and recorded in the City's "Compliance Training" spread sheet.
- h. The City in 2011 prepared a Stormwater Pollution Prevention Plan (SWPPP) for the City Maintenance Shop Facility. The City will review the SWPPP and update it as needed as well as review other City owned and or operated facilities to determine if they require a SWPPP and if so, prepare one for those sites. The City will perform periodic visual observation of discharges from the facilities to evaluate the effectiveness of the BMPs in place.
- i. The City will maintain records of inspections and maintenance or repair activities that it conducts related to stormwater infrastructure and facilities. At this time the records will be a combination of paper forms, spreadsheets, GIS data sets and documents. The City is in the process of purchasing an asset management software to track and maintain these records as well as costs.

S7. COMPLIANCE WITH TOTAL MAXIMUM DAILY LOAD REQUIREMENTS

Special Condition S7 of the Phase II Permit requires compliance with the Total Maximum Daily Load (TMDL) requirements, the development of a Quality Assurance Project Plan (QAPP), monitoring and reporting.

- a. The City has been identified in Appendix 2 of the Phase II Permit as a permittee that is required to comply with the Total Maximum Daily Load (TMDL) requirements for the Snohomish River Tributaries. The Lower Snohomish River Tributaries TMDL for fecal coliform bacteria was completed in June 2003. Following are current activities and codes that apply to complying with the TMDL requirements:
 - i. **Business Inspections:** The City will inspect commercial animal handling areas and commercial composting facilities to ensure implementation of source control BMPs for bacteria. The City will implement an ongoing inspection program to re-inspect facilities with bacteria source control problems a minimum of every three years.
 - ii. **Public Education and Outreach:** the City will conduct public education and outreach activities to increase awareness of bacterial pollution problems and promote proper pet waste management behavior. Currently,
 - City website provides general information and methods for the protection of the lakes and streams including Pet Waste Disposal.
 - City website provides information regarding animal control and “scooping” requirements.
 - City has posted signs identifying local streams and educational signs at the parks describing the surrounding environment and the possible impacts from the public including feeding the ducks and other wildlife.
 - Pet waste stations have been installed at the parks. This has decreased the amount of pet waste observed at the parks. A biodegradable bag is being used at the pet waste station.
 - iii. **Operations & Maintenance:** the City has installed and maintains animal waste collection stations and education stations at municipal parks and other City owned and operated lands reasonably expected to have substantial domestic animal (dog and horse) use and the potential for pollution of stormwater.

- iv. IDDE: All of the City's subbasins discharge to surface waters in the Snohomish River Tributaries TMDL area. The City, when conducting IDDE-related field screening under S5.C.3 of the Western Washington Phase II permit, will screen for bacteria sources. The City currently maintains a list of existing composting and animal waste facilities. The City will continue to follow its QAPP (TMDL monitoring) for sampling streams and/or discharges from stormwater conveyances to determine areas with highest bacteria concentrations.
- v. Targeted Source Identification & Elimination: The City has reviewed the fecal coliform data it collected from October 2008 to December 2013 per approved QAPPs under the 2007 Permit - The City has identified one high priority area (such as a tributary or a stream segment) that will be the focus of source identification and elimination efforts during this permit cycle. The area selected is the Kokanee creek Watershed mainly due to it consistently high fecal counts and a Microbial Water Quality Assessment ranking of D (A being the best and E that worst) The City will prepare written documentation of this review and the identified high priority area; documentation will be submitted with the Annual Report for 2015. The City has begun to implement source identification and elimination efforts in the MS4 subbasins discharging to the identified high priority area. The City is encouraged to address potential bacteria pollution sources not associated with the MS4. The City will implement the schedules and activities identified in S5.C.3 of the Western Washington Phase II permit in response to any illicit discharges found. Each annual report's TMDL summary will include qualitative and quantitative information about the source identification and elimination activities, including procedures followed and sampling results, implemented in the selected high priority area(s).
- vi. Surface Water Monitoring: The City has reviewed the fecal coliform data it collected from October 2008 to December 2013 per approved QAPPs under the 2007 Permit and has selected two surface water monitoring locations that are appropriate for continued characterization and long term trends evaluation of fecal coliform. The City will submit a draft revised QAPP to Ecology for review and approval, no later than February 2, 2015. If Ecology does not request changes within 60 days, the draft QAPP is considered approved. At a minimum, the monitoring program will:
 - Begin by August 1, 2015.
 - Collect 12 samples in at least one location per calendar year.
 - Submit available data to the Environmental Information Management (EIM) database by May 31 of each year.
 - Provide data summaries and narrative evaluation of the data in each annual report's TMDL summary.

S8. MONITORING AND ASSESSMENT

Special Condition S8.C of the Phase II Permit requires the City to implement a water Quality monitoring and assessment program and will include the following components:

- A. The City will provide, in each annual report, a description of any stormwater monitoring or stormwater-related studies conducted by the City during the reporting period. If other stormwater monitoring or stormwater-related studies were conducted on behalf of the City during the reporting period, or if stormwater-related investigations conducted by other entities were reported to the City during the reporting period, a brief description of the type of information gathered or received will be included in the annual report.
 - At this time the City does not conduct any stormwater monitoring or stormwater-related studies other than those related and reported under the TDML component of this permit.
- B. Status and Trends Monitoring. .The city has informed ecology in writing that the city has opted to do option #1 for the duration of the permit term. This is to satisfy the City's obligations under this section (S8.B). Status and Trends Monitoring Option #1: The City will pay into a collective fund to implement RSMP small streams and marine near shore status and trends monitoring in Puget Sound. The payments into the collective fund are due to Ecology annually beginning August 15, 2014. The payment amount for the City is \$6,512.
- C. Stormwater management program effectiveness studies. .The city has informed ecology in writing that the city has opted to do option #1 for the duration of the permit term. This is to satisfy the City's obligations under this section (S8.C). Effectiveness Studies Option #1: The City will pay into a collective fund to implement RSMP effectiveness studies. The payments into the collective fund are due to Ecology annually beginning August 15, 2014. The payment amount for the City is \$10,850.
- D. Source identification and diagnostic monitoring. The City will pay into a collective fund to implement the RSMP Source Identification Information Repository (SIDIR). The payments into the collective fund are due to Ecology annually beginning August 15, 2014. The payment amount for the City is \$1,006.